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UNITED STATES FEDERAL COURT
DISTRICT OF NEVADA

MICHAEL J. LONGI,
 Plaintiff,

vs.

TROY MANGUM, individually; WADMAN
 CORPORATION, a Foreign Corporation;
 DOES I through X, inclusive; and ROE
 CORPORATIONS I through X, inclusive,
 Defendants.

CASE NO.: 2:18-cv-00811-JAD-VCF

**STIPULATION AND ORDER TO
 EXTEND DISCOVERY DEADLINES**

FIRST REQUEST

IT IS HEREBY STIPULATED by and between Plaintiff MICHAEL J. LONGI, through his counsel of record, Dennis M. Prince, Esq., Tracy A. Eglet, Esq., and James A. Trummell, Esq. of EGLET PRINCE; and Defendant TROY MANGNUM and Defendant WADMAN CORPORATION through their counsel of record, William H. Doyle, Esq. of THE DOYLE FIRM, P.C. and Edward D. Boyack, Esq. of BOYACK ORME & ANTHONY, that discovery in this matter shall be extended for the purpose of completing the discovery described herein. Pursuant to FRCP 29(b), the parties offer the following in support of their first stipulation to extend discovery:

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STIPULATION AND ORDER TO EXTEND DISCOVERY DEADLINES

I.

DISCOVERY COMPLETED TO DATE

Plaintiff served Defendants with the following discovery to date:

1. Plaintiff's Initial FRCP 26.1 disclosure, and Three (3) Supplements thereto;
2. Plaintiff's Responses to Defendant's Requests for Production, Requests for Admissions and Interrogatories;
3. Plaintiff's Requests for Production, Requests for Admissions and Interrogatories to Defendants; and
4. Plaintiff's Expert Disclosure and Supplemental FRCP 26 (a)(2) Pre-Trial Disclosure, and Two (2) Supplements thereto.

Defendants served Plaintiff with the following discovery to date:

1. Defendants' Initial FRCP 26.1 disclosures, and Four (4) Supplements thereto;
2. Defendants' Requests for Production of Documents, Interrogatories and Requests for Admissions to Plaintiffs;
3. Defendants' Answers to Plaintiff's Requests for Production and Interrogatories to Plaintiffs; and
4. Defendants' Expert Disclosure and Supplemental NRCP 26 (a)(2) Pre-Trial Disclosure, and One (1) Supplement thereto.

II.

DEPOSITIONS TAKEN TO DATE

To date, no depositions have been taken.

III.

DISCOVERY THAT REMAINS TO BE COMPLETED

1. Inspection of Defendant's subject vehicle;
2. Deposition of Custodian of records for Verizon wireless;
3. Deposition of Michael J. Longi;

4. Deposition of Troy Magnum; and
5. Deposition of George Jenevein.
6. Depositions of percipient witnesses;
7. Depositions of Defendant Wadman Corporation's NRCP 30(b)(6) witness;
8. Depositions of Plaintiff's Expert Witness(es);
9. Depositions of Defendants' Expert Witness(es); and
10. Depositions of Plaintiff's treating physicians and other disclosed lay witnesses.

The Parties anticipate that they may need to conduct other forms of discovery, though not specifically delineated herein, and anticipate doing so only on an as-needed basis.

IV.

REASONS DISCOVERY WAS NOT COMPLETED WITHIN THE TIME LIMITS AND NEEDS TO BE EXTENDED

Although the Parties have been diligently working on this matter, due to the numerous witnesses and scheduling issues amongst the parties, there are still depositions to be taken, investigations of evidence that is out of the state of Nevada, and the need for expert reports to be drafted based on the additional depositions and evidence. In addition, Plaintiff obtained new co-counsel in the last five months, and Defendants have obtained new counsel in the last three weeks. Parties have agreed to extend discovery for One Hundred Twenty (120) days.

V.

CURRENT DISCOVERY DEADLINES AND TRIAL DATE

Last day to amend pleadings or add parties:	February 4, 2019;
Initial Expert Disclosure:	February 4, 2019;
Rebuttal Expert Disclosures:	March 6, 2019;
Discovery Cutoff:	April 4, 2019;
Dispositive Motions:	May 3, 2019; and
Joint Pre-Trial Order:	June 3, 2019.

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VI.

PROPOSED DISCOVERY DEADLINES AND TRIAL DATE

Last day to amend pleadings or add parties:	Closed;
Initial Expert Disclosure:	Closed;
Rebuttal Expert Disclosures:	June 21, 2019;
Discovery Cutoff:	August 2, 2019;
Dispositive Motions:	September 6, 2019; and
Joint Pre-Trial Order:	October 4, 2019.

DATED this 27th day of March, 2019.

EGLET PRINCE

/s/ Dennis M. Prince
DENNIS M. PRINCE, ESQ.
Nevada Bar No.5092
TRACY A EGLET, ESQ.
Nevada Bar No. 6419
JAMES A. TRUMMELL, ESQ.
Nevada Bar No. 14127
Attorneys for Plaintiff

DATED this 27th day of March, 2019.

THE DOYLE FIRM, P.C.

/s/ William H. Doyle
WILLIAM H. DOYLE, ESQ.
Nevada Bar No. 6960
1313 E. Osborn Road, Suite 220
Phoenix, Arizona 85014
Attorney for Defendants

ORDER

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED that the discovery deadlines will be extended as agreed to by the Parties herein and a separate amended scheduling order will **NOT** be issued.

IT IS SO ORDERED

DATED this 26th day of March, 2019.



FEDERAL COURT JUDGE

RESPECTFULLY SUBMITTED BY:

EGLET PRINCE

/s/ Dennis M. Prince
DENNIS M. PRINCE, ESQ.
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